

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
)	
Challenge Process to Competitive Coverage)	
in the Alternative Connect America Cost)	
Model (A-CAM))	

COMMENTS
OF
WEST TEXAS RURAL TELEPHONE COOPERATIVE INC.

West Texas Rural Telephone Cooperative Inc. (WTRT) (SAC 442166) hereby submits the following challenge regarding certain census blocks in its Texas study area being designated as “wired-served” in v2.2 of the Alternative Connect America Cost Model (A-CAM). A review of the June 30, 2015 FCC Form 477 data identified a competitive provider which may have led to the “served” designation. Immediately below are the census blocks for which WTRT seeks to contest the existence of a qualifying competitor, organized by the competitor identified in Form 477 data as serving in the block. Following the list of census blocks is a narrative on the competitor demonstrating how they fail to offer service meeting all of the requisite requirements in the blocks being challenged.

Census Block	Competitor Identified in Form 477 Data
483699503001718	Suddenlink Communications
483699503001751	Suddenlink Communications

Suddenlink Communications

Suddenlink Communications does not offer any service to any of the locations contained in the two census blocks being contested. These census blocks are remote and only contain a total of three locations (one location in the block ending in “1718” and two locations in the block ending

in "1751"). "Attachment A" to this filing shows email responses from Suddenlink to inquiries regarding the availability of service to each of the three locations in the two census blocks. The response to all three inquiries was that the address is not in Suddenlink's system and therefore not yet serviceable.

In addition, "Attachment B" contains a map showing the census blocks in WTRT's study area that are served by Suddenlink, according to the Form 477 data. The three census blocks highlighted in blue are blocks that Suddenlink serves and are not being challenged. It is logical that Suddenlink would serve these blocks since they are immediately outside the city of Farwell, where there is a concentration of people. However, Suddenlink does not report serving any blocks beyond those shaded in blue, except for the two contested blocks shaded in purple. It is illogical that Suddenlink would be offering service to those two blocks, when they do not report offering service to any of the more populated blocks closer to the downtown portion of Farwell.

Respectfully submitted,



Amy Linzey

Chief Executive Officer and General Manager

West Texas Rural Telephone Cooperative Inc.
3425 U.S. Highway 385
P.O. Box 1737
Hereford, TX 79045
(806) 364-3331

April 26, 2016

From: suddenlink@mailmw.custhelp.com [<mailto:suddenlink@mailmw.custhelp.com>]
Sent: Wednesday, April 20, 2016 2:03 PM
To: rickb@wtt.net
Subject: I would like to add services [Incident: 160420-000638]

Thank you for your request!

Recently you requested assistance from our online support center. Below is a summary of your request and our response. Thank you for allowing us to be of service to you.

Subject: I would like to add services

Response By Email (Juli C.) (04/20/2016 02:02 PM)

The address is not in our system so I've submitted a request for a technician to visit your location to see if there is any of our cable plant in that area. It takes several days, but I will contact you back to let you know if we can provide service.

Regards,

Juli

Customer By CSS Email (Rick Bartels) (04/20/2016 02:00 PM)

Hi Juli,

I really didn't understand the response below. This location, 395 US Highway 84, is about 2 miles southeast of Farwell. Does Suddenlink provide any internet or phone service that far from Farwell?

Thanks,

Rick

From: suddenlink@mailmw.custhelp.com
Sent: Wednesday, April 20, 2016 3:27 PM
To: beancntr@wrtt.net
Subject: I have a general question / comment [Incident: 160420-000722]

Thank you for your request!

Recently you requested assistance from our online support center. Below is a summary of your request and our response. Thank you for allowing us to be of service to you.

Subject: I have a general question / comment

Response By Email (Karyn M.) (04/20/2016 03:27 PM)

Dear Mr. Kendrick,

Thank you for your email in regards to service at 484 County Road 1. I appreciate the opportunity to assist you today.

I do have services listed on County Road 1, but 484 is not in the system. we will need to do a serviceability ticket in order to find out if we can reach your home.

Please respond back with the following information:

A brief description of your house.

A phone number that we can use to reach you if needed.

Directions to your house from a major intersection.

Please name the intersection.

We will be happy to submit a Serviceability Request, and then contact you when we know the results.

Thank you for choosing Suddenlink. If you have any further questions, please feel free to contact us Monday through Friday 8:00AM to 10:00PM CST, or 9:00AM to 6:00PM CST on Saturday and Sunday via our online chat at <http://www.suddenlink.com/contact-us/#tabs-3>, or by phone at 1-866-867-1451, where we are available to assist you 24 hours a day, 7 days a week.

Thank you,

Karyn M.

iCare Specialist

From: suddenlink@mailmw.custhelp.com [mailto:suddenlink@mailmw.custhelp.com]

Attachment A

Sent: Thursday, April 21, 2016 4:20 PM

To: Chelsea Anderson <chelsea.anderson@wtrtcoop.com>

Subject: I would like to add services [Incident: 160421-000704]



Thank you for your request!

Recently you requested assistance from our online support center. Below is a summary of your request and our response. Thank you for allowing us to be of service to you.

Subject: I would like to add services

Response By Email (Monica Z.) (04/21/2016 04:19 PM)

Dear Chelsea

Thank you for submitting your order request. Please read below for the details.

Your address is not yet serviceable in our system. We have submitted a serviceability request on your behalf. Your order request will be in a processing status until we receive the results of our request. This generally takes 3-4 business days.

Thank you,

Suddenlink Communications eCommerce Team

Customer By (Chelsea Anderson) (04/21/2016 03:54 PM)

Do you offer internet and phone at this location 480 CO RD 1 Farwell, TX 79325? If so what is the highest internet speed available? Please let me know as soon as possible. Thanks
Chelsea

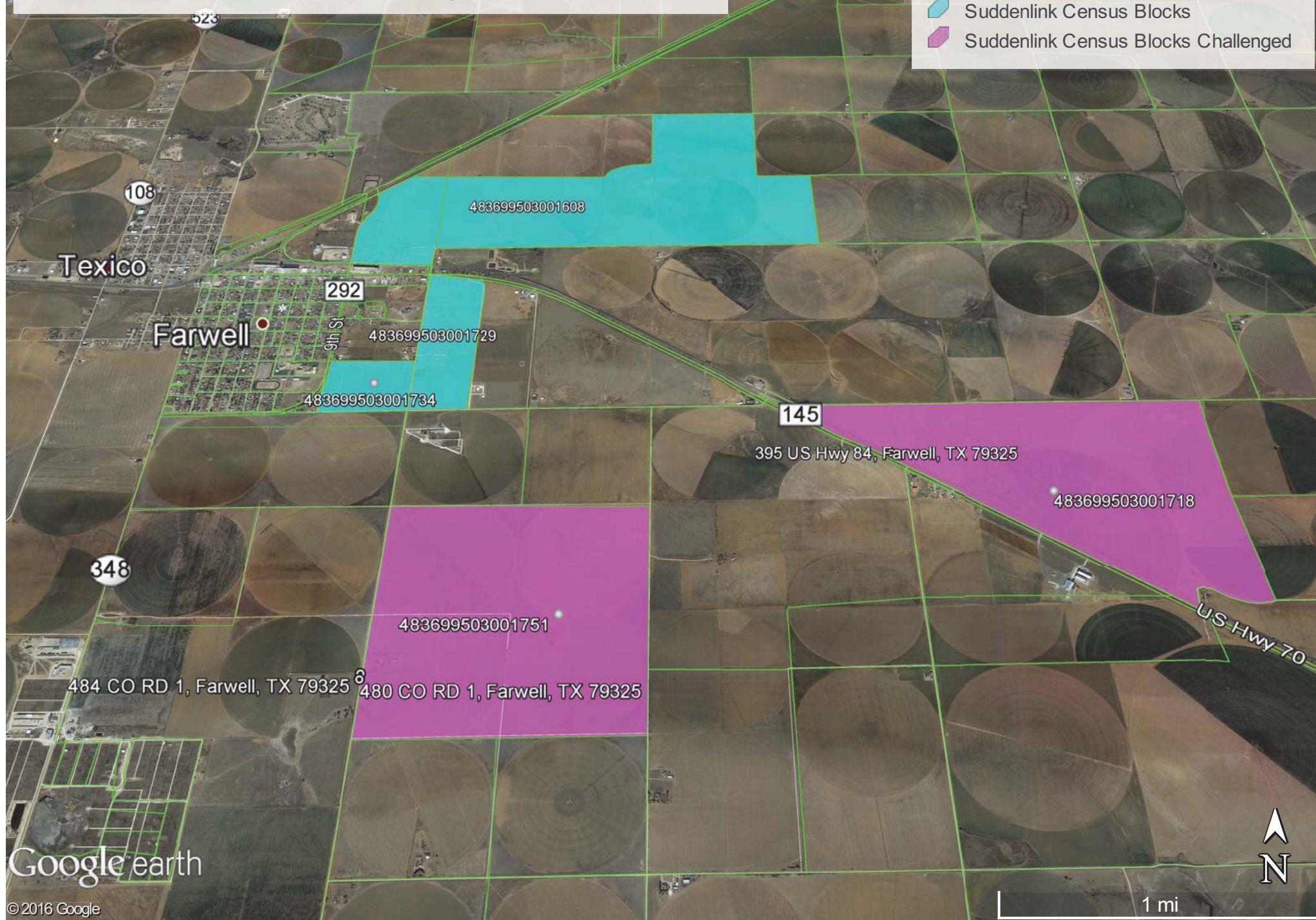
West Texas Rural Telephone Cooperative, Inc.

FCC - A-CAM Competitive Census Block Challenge

Legend

Attachment B

- Farwell, TX 79325
- Suddenlink Census Blocks
- Suddenlink Census Blocks Challenged



Google earth

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